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Joyce C. Scott
Executive Director

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Michelle Probert
Office of MaineCare Services
11 State House Station
Augusta, Maine 04333-0011

Dear Michelle:

I very much appreciated the opportunity of the meeting that you hosted on April 25, 2011. I wanted to reconfirm some of the most salient points in my opinion of moving forward. I would very much urge that the department conduct further studies as to the feasibility of the plan that is being considered.

I can speak for the Waldo County Transportation Program when I say that if you move forward and take the revenue from the Family Friends and Neighbors program, as well as the revenue from the Volunteer Driver program, and also take the DHHS contracts and put them all with a broker, we will be left with approximately \$250,000 from all sources to operate a very limited public transportation program in Waldo County. Our present budget is \$905,087.01 for operating revenue. The pass-through revenues are \$655,788.69. Clearly, we will lose 75% of our operating dollars. As the smallest agency provider this will give you some idea of what these changes mean on the ground.

Presently, with full revenue we are struggling to keep 13 vehicles on the road and oversee approximately 26 volunteer drivers. Under another system we would struggle to have two vehicles on the road. This makes it very clear to me that the broker will be in a set up to fail mode in the rural areas of the state as others have said the same thing. We have successfully provided transportation in the rural areas for over 30 years.

Since the state has neglected over the years to integrate the public and MaineCare systems at the state level, for whatever reason, and has also not managed to keep abreast of the actual costs of running these systems, it could be said that the Department of Transportation has subsidized MaineCare transportation as they provide all of our vehicles with our local match dollars.

I understand that CMS did not want to subsidize public transportation, so I would suspect that a plan at the state level needs to be put in place or the clients, our most vulnerable citizens, will lose access. If a broker finds no available system for the rural areas beyond taxi, they will not be successful and when you hear through the rumor mill that the larger providers do not feel that the brokerage RFP is worth their attention because of the risk, it is apparent that something is gravely wrong. They have been in the business for over thirty years and \$45,000,000 is a big carrot.

It is my further understanding that should a review of costs at the state level have been taken into consideration the vehicle replacement and maintenance, that we would have been included in vehicle costs and not in inflated

base rates (coming under administration). Actual mileage costs were far less than actual. This process, done correctly, would have allowed the opportunity to maximize the match allowable.

I am sure that from the perspective of MaineCare that not having to audit, monitor, or manage this and being able to subcontract this function for the same cost sounds very appealing. I would submit that it is not feasible and that after the clients lose access, the systems are dissembled, and more Maine folks are out of work that the fix will be far more expensive.


Clearly, none of us can go back and change history. This would include many years of no updates in regulations, no audits, no oversight, no cost oversight, and no integration at the state level with public transportation. We can, however, move forward cautiously and put in safeguards that protect the vulnerable clients in Maine and the jobs of the workers who have worked diligently to serve them over the years.

A broker with no providers is as broken as a system with no oversight and management. The citizens of the state have spent a great deal of money providing technology upgrades and an initial audit that would allow many of the benefits to move forward successfully. The volunteer system at this time is growing more precarious every day with the rising cost of gasoline. At least one third of the delivery system depends on these folks. Please don't think that this is a cushy or easy process. Transporting vulnerable adults with many variances of disability, both mental and physical is extremely challenging and the process involves many difficult interactions that are extremely personal and often frightening and distasteful. Human feces, blood and vomit may be all in a day's work as will violent behaviors, and bodies that don't function to keep the client or the other passengers safe. Forty-one cents per mile is very little when it will now not even assure that there is any mechanism to replace the vehicle that is being worn out because the cost of fuel is so high.

Determining eligibility at the broker level, whether it is a provider such as we have been or a new broker, is a very dicey proposition. The card for MaineCare should designate the proper eligibility, since it changes often and has many types of eligibility. Some can ride and some cannot. Given that we have to rely on a phone system to find out that is often not up to date doesn't seem to be the most cost effective process. Asking questions to determine what the needs are with all the confidentiality concerns around medical information make this a very difficult issue indeed and one that is best managed by the state as they have access and are entitled to this information, and the broker or provider is not.

I will be retiring after 33 years in this business and I feel obligated to do my level best to speak out when I see the work of three decades being dissembled without a safe structure of replacement for our citizens. Transportation has always been a difficult financial configuration and a very complicated funding process, since it is a patchwork in order to provide maximum service in the rural areas. Some of the bigger agencies may have made dollars and could use them to put back improvements into the system. In our case, it was Transportation grant money that provided our dispatch system to bill MaineCare and we struggle to break even.

I certainly don't dispute that the system can use attention. I simply don't think the people of Maine can afford the lack of access while any new entity struggles to set up something that has been totally dissembled and took three decades to build. I would be happy to clarify and discuss further, should you find that helpful. I recognize that your job is very challenging.

Best,

Joyce C. Scott
Executive Director, WCAP